



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

LUCERO GUADALUPE SANCHEZ
LOPEZ,

Defendant.

Case No.: _____

COMPLAINT FOR VIOLATION
OF

Title 21, U.S.C., Secs. 959, 960, 963
and Conspiracy to Distribute for the
Purpose of Unlawful Importation a
Controlled Substance (Felony)

'17MJ2036

The undersigned complainant being duly sworn states:

Beginning in or about January 2013 and continuing to June 21, 2017, in the country of Mexico and elsewhere, defendant LUCERO GUADALUPE SANCHEZ LOPEZ, who first entered the United States in the Southern District of California, did knowingly and intentionally conspire with others known and unknown to distribute and cause the distribution of a Controlled Substance, to wit: 5 kilograms and more of cocaine, a Schedule II Controlled Substance, intending, knowing and having reasonable cause to believe that the controlled substance would be unlawfully imported into the United States; in violation of Title 21, United States Code, Sections 959, 960, 963.

The complainant states that this complaint is based on the attached statement of facts, which is incorporated herein by reference.

Felix Trevino
Special Agent
Homeland Security Investigations

Sworn to before me and subscribed in my presence, this 22 day of June 2017.

Hon. Barbara L. Major
United States Magistrate Judge

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PROBABLE CAUSE STATEMENT

I, Special Agent Felix Trevino, declare under penalty of perjury, the following is true and correct:

On June 21, 2017, at approximately 9:30 am, defendant LUCERO GUADALUPE SANCHEZ LOPEZ, a Mexican citizen, applied for admission to enter into the United States from Mexico through the Otay Mesa Cross Border Xpress (CBX), Port of Entry.

A Customs and Border Protection (CBP) Officer conducting initial inspections at the primary booth received information from a law enforcement database that SANCHEZ LOPEZ'S United States visa had been canceled by the U.S. State department. The officer then conducted additional law enforcement database checks in a CBP system and learned that SANCHEZ LOPEZ is believed to have been involved in illegal drug trafficking and money laundering activities. SANCHEZ LOPEZ was subsequently detained by CBP pending further investigation as to her immigration status and visa removal.

I later reviewed that same information and learned that SANCHEZ LOPEZ was a targeted suspect in a Homeland Security Investigations (HSI) investigation run out of Nogales, Arizona. I subsequently spoke with an HSI Supervisory Special Agent (SSA) assigned to the Nogales, Arizona, office who was a part of the

1 investigation targeting SANCHEZ LOPEZ and others. The following facts are
2 based on that investigation.

3 Since January 2012, HSI has been investigating the drug trafficking and
4 money laundering activities of a drug trafficking organization (“DTO”) led by
5 JOAQUIN GUZMAN LOERA, also known as “EL CHAPO,” which is known as
6 the Sinaloa Cartel. Over the past three decades, GUZMAN LOERA, who is now in
7 U.S. custody in the Eastern District of New York, had been investigated by various
8 federal law enforcement agencies in both the United States and Mexico for
9 transporting large quantities of illegal drugs into the United States, laundering
10 billions of dollars in drug proceeds, and contributing to the systemic corruption at
11 various levels of government in Mexico. In the course of that investigation, agents
12 learned that the DTO relied on pilots, transporters, stash house operators, lookouts,
13 drivers, mechanics, false compartment mechanics, plane brokers, truck brokers,
14 money laundering via straw purchasers, and registering of aircraft and vehicles,
15 among other activities. The investigation found that the DTO transports multiple-
16 hundred kilogram quantities of cocaine and other illegal drugs into the United States,
17 including into the Southern District of California and elsewhere.

18 Pursuant to their investigation, HSI agents obtained federally authorized
19 wiretaps in the District of Arizona targeting numerous communications devices used
20 by members of the Sinaloa Cartel. The wiretapped communications showed that
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1 members of the leadership of the Sinaloa Cartel communicated with lower-level
2 members through a very complex and compartmentalized communications structure.
3 Specifically, agents learned that the Cartel used a complicated communication
4 system of layered communication that left at least two levels of communication
5 devices between GUZMAN LOERA and his subordinates. Instead of
6 communicating directly with Cartel members conducting the field operations of the
7 Cartel, the Cartel leaders used intermediaries, or secretaries, as the “first tier” level
8 device operators. The secretaries relayed messages, usually verbatim, to and from
9 Sinaloa Cartel leadership and those conducting Cartel drug trafficking and money
10 laundering operations to “second tier” communication devices. The “second tier”
11 devices, also operated by secretaries, then repeated the messages, also verbatim, and
12 forwarded only important business messages to a top tier level of devices, which
13 were controlled by the personal secretaries of GUZMAN LOERA who were
14 physically with GUZMAN LOERA. These secretaries also passed GUZMAN
15 LOERA’s orders down from the top tier level devices to the “second tier” devices.
16 These “second tier” devices then passed the same messages down to the “first tier”
17 devices, who then forward the messages to the Cartel’s operatives across the world.
18 To limit confusion, Cartel members also used a unique address system during the
19 course of each message where a parenthesis indicating who the message was from
20 would precede the message itself.
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1 During the course of the investigation, agents learned that a subject known
2 then as "PIEDRA," and later identified as SANCHEZ LOPEZ, and her sister, known
3 then as "CARO," were involved in laundering and distributing drug-related
4 proceeds, and otherwise acting in furtherance of a drug trafficking conspiracy, for
5 GUZMAN LOERA and other Sinaloa Cartel leaders.
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8 On September 24, 2013, during a period of judicially authorized interception,
9 the following translated messages were intercepted from a second tier
10 communications device using a screen name "USACELL 2013" to a first tier
11 communications device using the screen name "OFIS." USACELL 2013 messaged,
12 "PIEDRA-) I need you to send me a Mexican phone number so PANCHO can
13 deliver one hundred thousand (100,000) dollars to a person." OFIS then received a
14 message from a device using the screen name CAMARON: "PIEDRA) CONDOR)
15 Okay. It's right here 5536458266 if anything. When CARO doesn't answer, call
16 me." USACELL 2013 then responded to OFIS: "PIEDRA-) Acknowledged.
17 Thanks. They're going to call PANCHO so he can deliver one hundred thousand
18 dollars (\$100,000)." CAMARON then forwarded two messages to OFIS: "PIEDRA)
19 CONDOR) Acknowledged, sir. I let PANCHO know, he's waiting for the people to
20 deliver to him." and "PIEDRA) He just picked five hundred thousand (500,000)
21 dollars, sir."
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1 Upon review of the messages, the HSI supervisory agent in Arizona told me
2 that based on his training and experience GUZMAN LOERA, through the
3 intermediary device of USACELL 2013, and his secretary "CONDOR," had sent
4 down an order to "PIEDRA," later identified as SANCHEZ LOPEZ, to facilitate the
5 movement of drug proceeds by obtaining a number for a person in Mexico known
6 as "Pancho" to receive \$100,000 USD owed to the drug trafficking organization.
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8 "PIEDRA" responded through the use of a secretary device using the screen name
9 "CAMARON" with the phone number to be contacted so that the money could be
10 delivered. "USACELL 2013" then responded that the persons who were going to
11 be delivering the drug proceeds would be calling the number to arrange the pickup.
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13 "PIEDRA" later responded through "CAMARON" to "OFIS" that \$500,000 US
14 dollars had been picked by a person known as "Pancho." "Pancho" was known in
15 the course of the investigation as being involved in the transportation and
16 distribution of large quantities of drugs, including cocaine, in the United States and
17 elsewhere, and SANCHEZ LOPEZ's payment to "Pancho" facilitated such
18 trafficking of illegal drugs.
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23 On January 20, 2014, during a period of judicially authorized interception,
24 HSI agents in the District of Arizona intercepted the following messages. A
25 communications device using the screen name IUSACELL messaged a first tier
26 device using the screen name CHANATE, "MAICO-) Good afternoon. I need a
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1 number so that CONTADOR [accountant] can deliver 380 thousand pesos.” The
2 communication device with the screen name CHANATE responded “PIEDRA)
3 6673062554 That is the one sir.” IUSACELL messaged, “MAICO-) Understood,
4 Whom should they ask for at that number.” CHANATE responded, “PIEDRA) For
5 MAICO.”
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8 The SSA agent in Arizona later related to me that based on his training and
9 experience that IUSACELL sent a message addressed to “MAICO,” later identified
10 as SANCHEZ LOPEZ, from GUZMAN LOERA’s secretaries asking for a telephone
11 number to coordinate the delivery of \$380,000 in laundered Mexican pesos that were
12 the proceeds of illegal drug trafficking. “CHANTE,” the secretary for “PIEDRA,”
13 responded with a phone number and then confirmed that “MAICO,” or SANCHEZ
14 LOPEZ, would be the one coordinating the delivery. Based upon the messages,
15 agents believed “PIEDRA” and “MAICO” to be the same person (SANCHEZ
16 LOPEZ).
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20 The Arizona SSA also informed me that HSI agents working in conjunction
21 with DEA special agents and Mexican authorities had later executed a series of
22 capture operations aimed at apprehending GUZMAN LOERA in February of 2014.
23 As part of the capture operations, Mexican authorities had conducted a raid on a
24 house in Culiacan, Sinaloa, on February 16, 2014. During that raid, GUZMAN
25 LOERA had escaped through a specially constructed hidden tunnel built under a
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1 bathtub in the residence. Further operations resulted in GUZMAN LOERA's arrest
2 in Mazatlan, Mexico on February 22, 2014.

3 On April 9, 2014, HSI agents interviewed a member of the Sinaloa Cartel
4 cooperating with the government who was previously arrested for drug trafficking.
5 That cooperating individual (CI) stated that on February 23, 2014 (the day after
6 GUZMAN LOERA's arrest), he had been contacted by another drug trafficker and
7 asked if he would be amenable to talking to a subject using a communications
8 device with the screen name "TERE." "TERE" wanted to establish communications
9 with "LOS MENORES," which was a code name that members of the Cartel used
10 for the sons of GUZMAN LOERA. The CI agreed to speak to "TERE" and later
11 established communication with her. During the communications, the CI stated that
12 "TERE" asked questions about a person identified as "CHEF" and about drug
13 smuggling operations in Ecuador. CHEF has been identified as OSCAR ANTONIO
14 BERROCAL SANDI, who was a member of the Sinaloa Cartel based in Ecuador
15 and who was responsible for coordinating the transportation of multi-kilogram
16 quantities of cocaine on behalf of GUZMAN LOERA. BERROCAL-SANDI was
17 arrested in Colombia for drug trafficking. The CI stated that "TERE" requested to
18 meet with the CI in person.
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26 The CI stated that he later met with "TERE" in Mexico, who told him that she
27 was the girlfriend of GUZMAN LOERA and that she was also known as "MAICO."
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1 “TERE” stated that she wanted to contact the sons of GUZMAN LOERA to deliver
2 CHAPO’s “things,” which the CI believed to be a reference to illegal drugs, and that
3 she had information regarding the location of some “merchandise,” also believed by
4 the CI to be a reference to illegal drugs. “TERE” also told him that she was with
5 GUZMAN LOERA when he escaped through a tunnel with Mexican authorities
6 raided his house on February 17, 2014. The SSA in Arizona also informed me that
7 HSI Nogales agents had intercepted communications corroborating this. The
8 CI also related that “TERE” had told him that she escaped the raid and told told
9 GUZMAN LOERA to go to Cosala, Sinaloa, with her because she worked there as
10 a “deputy” (diputada). SANCHEZ LOPEZ is known to be a former government
11 official in Sinaloa.
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13 The CI later made contact with a second tier communications device of the
14 “OFIS” (GUZMAN LOERA’S network) and stated that he had met with “TERE”
15 and that she had said that she also used the name “MAICO.” The CI stated that
16 “OFIS” knew who she was and that the CI was told to give her the contact info for
17 “OFIS” so she could communicate with “LOS MENORES” (GUZMAN LOERA’s
18 sons).
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20 The CI was shown a photograph of LUCERO GUADALUPE SANCHEZ
21 LOPEZ and identified her as the person he had met with whom he knew as “TERE”
22 and “MAICO,” and who had told him she was a “deputy” in Cosala, Mexico.
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2 Based upon the proffered evidence, LUCERO GUADALUPE SANCHEZ-
3 LOPEZ was arrested at the Otay Mesa Cross Border Xpress (CBX), Port on June 21,
4 2017, by HSI San Diego Special Agents and charged with a violation of Title 21,
5 United States Code, 959, 963, conspiracy to distribute a controlled substance, to wit:
6 5 kilograms and more of cocaine hydrochloride, outside the United States intending,
7 knowing, or having reasonable cause to believe that the controlled substance will be
8 unlawfully imported into the United States, and was later scheduled to be booked
9 into the Metropolitan Correctional Center.
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